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In re:	:	Sub-Chapter V Chapter 11
	:	
ZHANG MEDICAL P.C., d/b/a NEW HOPE	:	Case No.: 23-10678-pb
FERTILITY CENTER,	:	
	:	
Debtor.	:	
	-X	

FRANK MOLLO, declares pursuant to 28 U.S.C. § 1746 as follows:

2. The Landlord leases to the Debtor the entire second, third, fourth and fifth floors (the "Leased Premises") in the Building. I have personal knowledge of the Leased Premises, having visited the Leased Premises on a number of occasions in connection with my duties in managing the Building. I personally conduct a walk-through of all the floors in the Building (including the Leased Premises) once a week. Because the Debtor operates a medical practice, there are certain areas in the Leased Premises from which I am restricted access, but I am generally free to access all the floors to the Leased Premises.

3. I understand that the Debtor has described its use of the second floor as limited to a lab that occupies less than 1,000 square feet, and has stated that the fifth floor is unused and

vacant, save for some construction materials. As I describe below, this description is not complete or accurate.

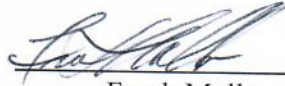
4. On July 7, 2023, on one of my walk-throughs, I took some photographs of the second and fifth floors, and on July 10, 2023, my engineer took some additional photographs of the second and fifth floors. Photographs of the second floor that were taken are annexed hereto as Exhibit A, and photographs of the fifth floor that were taken are annexed hereto as Exhibit B.

5. The Debtor's description of the second floor as containing only a small lab is not accurate. As the photographs in Exhibit A plainly show, there is much more than just a lab on the second floor. The second floor also contains a large medical imaging room, with an adjoining waiting area; a conference room with another adjoining waiting/seating area; an area for a grand piano; a storage room; and an area for the desk of the Debtor's own mechanic/handyman. Additionally, I have been informed by security guards who work at the Building that the second floor has, on occasion, been used for social purposes after business hours, with music and other indicia of a social gathering. My engineer has seen 3-4 individuals working on the floor during the week and on Saturday. Based on the above, it appears to me that the Debtor is and has been making full use of the second floor.

6. As the photographs in Exhibit B show, the fifth floor is in mid-construction as a result of construction begun by the Debtor pursuant to its own plans. There is construction material and debris throughout the floor. The plumbing is shut off on the fifth floor because of a leak that the Debtor has not resolved. The build-out being conducted on the fifth floor is specialized and is tenant-specific for medical practice use. Accordingly, the specialized nature of the (unfinished) build-out severely narrows the field of potential tenants that would consider leasing that space.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: July 12, 2023

A handwritten signature in blue ink, appearing to read 'Frank Mollo', is written over a horizontal line.

Frank Mollo

EXHIBIT A
(PHOTOS OF 2ND FLOOR)



















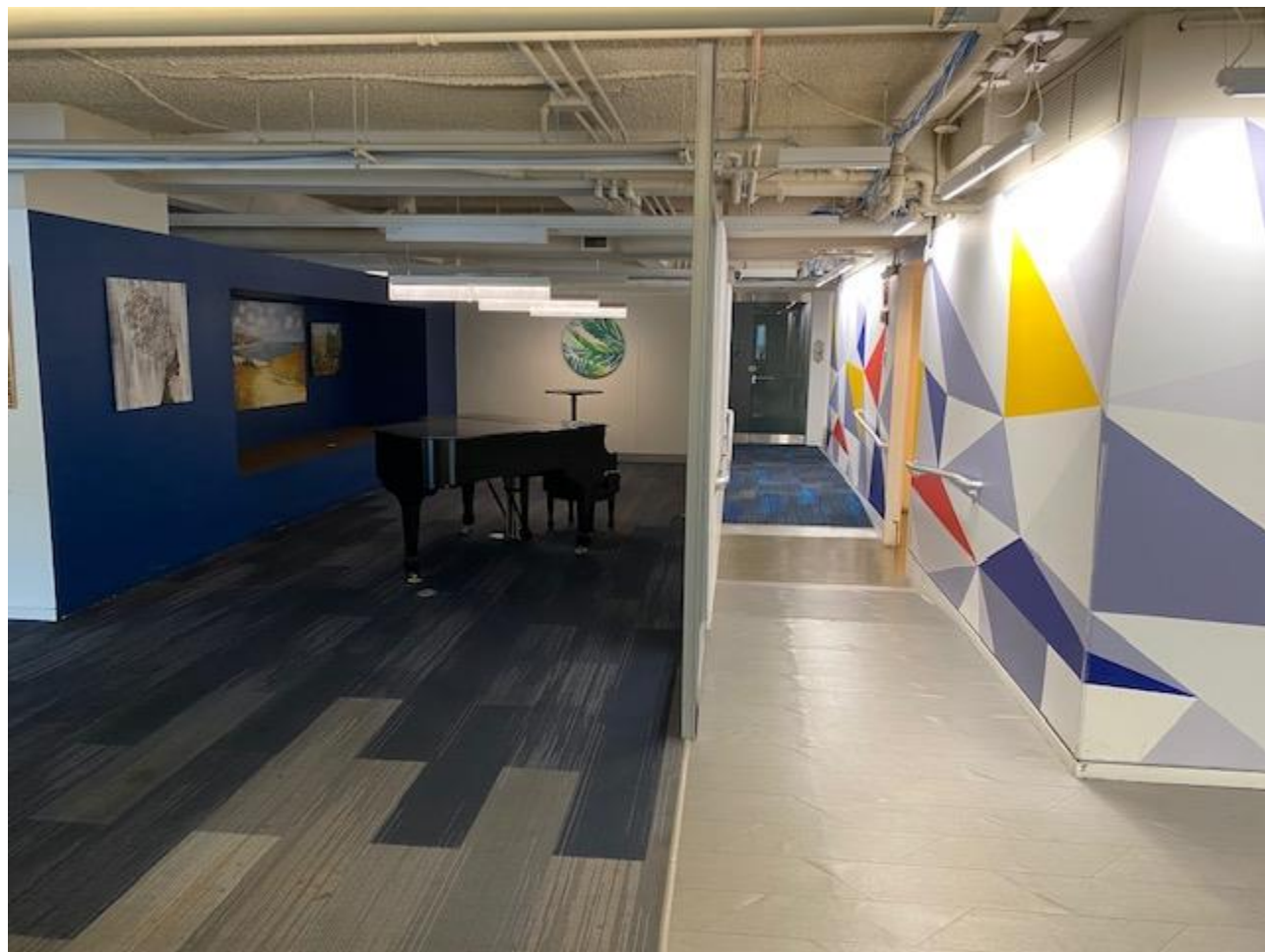


EXHIBIT B
(PHOTOS OF 5TH FLOOR)















